

**Before the
Federal Communication Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Verizon Petition For Emergency Declaratory And Other Relief)	WC Docket No. 02-202
)	

**Comments Of:
Fred Williamson and Associates, Inc. (“FW&A”)
On behalf of:**

**Chouteau Telephone Company, an Oklahoma ILEC
H&B Telephone Communications, Inc., a Kansas ILEC
Moundridge Telephone Company, Inc., a Kansas ILEC
Pine Telephone Company, Inc., an Oklahoma ILEC
Pioneer Telephone Association, Inc., a Kansas ILEC
Totah Telephone Company, Inc., a Kansas and Oklahoma ILEC
Twin Valley Telephone, Inc., a Kansas ILEC
(Collectively, “ILECs”)**

COMMENTS

Verizon, in its Petition, seeks emergency relief from the Commission as a result of the recent WorldCom bankruptcy filing to ensure the continuity of service to customers and to limit the financial effects of this and other possible filings. Specifically, Verizon requests that the Commission:

1. Allow carriers to revise tariffs to ensure against non-payment.
2. Support Independent Local Exchange Carriers (ILECs) in the bankruptcy courts to obtain adequate assurance of payment for services rendered to customers (such as WorldCom) in bankruptcy.
3. Ensure that purchasers of bankrupt carriers' existing service arrangements comply with the core requirements of bankruptcy law.
4. Mandate Competitive Local Exchange Carriers (CLECs) to provide the information necessary to coordinate carrier-to-carrier transfers.

FW&A and the ILECs it represents support the relief requested by Verizon. It is critical that the Commission take these and any other necessary actions¹ to ensure that customers in rural ILEC areas are not harmed by the bankruptcies of carriers such as WorldCom. The average interstate access revenue owed to the ILECs by WorldCom, stated on a per line / per month basis, ranges from approximately \$2.50 to \$5.50 (where WorldCom has approximately 10% to 25% of the ILECs' total interstate access business) to well over \$10.00 (where WorldCom has a much higher percentage of the ILECs' total interstate

access business. In the intrastate jurisdiction where the ILECs operate, the average intrastate access revenue owed to the ILECs by WorldCom, stated on a per line / per month basis, ranges from approximately \$1.00 to \$3.00 (where WorldCom has approximately 5% to 15% of the ILECs' total intrastate access business) to over \$10.00 (where WorldCom has a higher percentage of the ILECs' total intrastate access business). These revenues are used by the ILECs to maintain and construct the network used not only by WorldCom, other IXC, CLECs and CMRS providers, but also by local exchange residential and business consumers. Revenue losses caused by the WorldCom bankruptcy could not be sustained by the ILECs without serious consequences to the ILECs and its local exchange customers. Unless the actions requested are taken by the Commission, the effect on all customers, and in particular those in rural areas, will likely be extremely detrimental because ILECs may not be able to continue to maintain a high quality network and services at just, reasonable and affordable rate levels.

Respectfully submitted on behalf of the ILECs by,

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¹ The Commission must insure that the purchasers of WorldCom's existing business comply with Commission rules and continue to honor and abide by all WorldCom contracts, agreements, interconnection agreements, etc.

August 15, 2002

